

## **REMARKS**

No claims have been amended. Claims 1-31 are pending in this application.

The Office Action Summary page indicates that claims 1-29 are pending. This is not correct. Claims 1-31 are currently pending in this application, as noted in paragraph 2 of the Detailed Action on page 2 of the Office Action.

The Office Action Summary page indicates that claims 1-29 are rejected, but the Detailed Action (pages 2-4) of the Office Action does not mention or provide any indication as to the status or grounds for rejection of claims 15-26 or 31. Applicants respectfully request correction.

On page 2 of the Office Action, it states that "Applicant's arguments with respect to claims 1-31 have been considered but are moot in view of the new ground(s) of rejection." The Office Action, however, simply repeats the same rejection stated in the Office Action dated Aug. 11, 2004. Specifically, the Office Action repeats that claims 1-14 and 27-30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Moore (U.S. Patent No. 5,917,925) in view of Racanelli (U.S. Patent No. 4,511,793) and further in view of Liechti et al. (U.S. Patent No. 5,715,164). A response to the Office Action dated Aug. 11, 2004, was timely filed on October 7, 2004. The present Office Action does not address in any manner the Applicant's previous response filed on October 7, 2004. Applicants again traverse this rejection, and respectfully request that the response as filed on October 7, 2004, reproduced below for the Examiner's convenience, be properly considered and a response provided.

The present invention is directed to a mail piece verification system for processing a mail piece that includes an incoming mail processing center for receiving a mail piece and obtaining data from the mail piece. The mail piece data is uploaded to a data center that performs a verification check on the mail piece data and downloads instructions, based upon the verification check, to an outgoing mail processing center located downstream from the incoming mail processing center. The outgoing mail processing center then uses the instructions, received from the data center, to process the mail piece.

In view of the above, claim 1 is directed to a mail piece verification system for processing mail pieces that comprises “an incoming mail processing center for receiving the mail piece and obtaining the mail piece data, the incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center” wherein “the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece.”

Moore is directed to a method for authenticating indicia marks to reduce the amount of counterfeit marks. The system generates a unique pattern comprising encoded input data that comprises a unique customer identifier and a unique postal service identifier. The unique pattern is applied to a mail piece as an indicia using an ink formulation comprising one or more chemical agents detectable when exposed to a visible or non-visible frequency range of light. The authentication process is completed by exposing the goods to light in the visible or non-visible frequency range thereby making the pattern detectable, scanning the detectable pattern on the mail piece, degenerating the pattern to retrieve the encoded input data, decoding the encoded data to retrieve the input data, and comparing the input data against all stored input data in a mass storage device to determine whether the indicia is authentic. (Col. 8, lines 1-24).

The Office Action contends that Moore, at Col. 3, line 58 to Col. 4, line 20, discloses the present invention. The passage cited in the Office Action is reproduced, in its entirety, below.

The present invention provides an authenticating, tracking, and anti-counterfeiting indicia system which can track

various goods. The system is directed toward marking, tracking, and postal fee collection of mailpieces, but can be used to authenticate and track a wide variety of goods and articles of manufacture. The system includes a control computer, one or more host computers which cooperate with the control computer, a marking system, and a field reader system, which are all compatible and can be physically linked via data transmission links. An identifiable mark is placed on the mailpieces, goods, products, packages of goods, or on materials out of which the goods are to be made, which enables subsequent inspection. The mailpieces, goods or materials can be field inspected with a field reader to verify proper fee payment, to determine the authenticity of the mark or the goods, or to track the distribution of the mailpieces, goods or articles, and to determine the final point of distribution of the marked items.

Attention will be directed to the system embodied as an information based indicia program (IBIP) for a postal service. The control computer is under control of the IBIP vendor and the postal service. The host computer is centrally located. Each participant in the IBIP, hereafter referred to as the "customer", possesses a host computer which, in turn, controls one or more indicia printers. Each host computer is isolated from the control computer by a postal security device preferably in the form of an enigma card. This prevents access by one customer to another customer's confidential information by routing through the control computer. Each indicia printer, under the control of the host computer, affixes a mark mailpieces. The mark is preferably a two dimensional encrypted matrix. The host computer and indicia printer therefore replaces the prior art postage meter, or replaces the manual affixation of postage stamps to mailpieces.

Note that the scanning performed in the system of Moore is done utilizing a field reader that is a hand held device housed in a briefcase or the like. (Col. 24, lines 7-10). At any point within the mail system the indicia mark affixed to the mail piece can be read on site with the field reader. All information contained in the indicia mark is transmitted back to the appropriate host computer if the information pertains directly to the customer or is "customer specific," or transmitted back to the control computer 12 if the information pertains to the postal service operation or the vendor's operation. (Col. 11, lines 8-17). The control computer 12 and the host computer 14 receive the data from the field reader, and interface

with the encryption unit 15 where the message is decoded and converted to clear text. The control computer then searches the database to validate the indicia mark and any other postal service specific information. The host computer reads and validates any customer specific information. Once validated, both the control and the host computers send messages back to the field reader 18 which displays the decoded message and any other pertinent information pertaining to this specific indicia, i.e., place, time of marking, or destination. If the marked mail piece is counterfeit or has been received at the wrong point of final distribution, an invalid signal is transmitted and displayed on the field reader computer screen. (Col. 12, lines 25-43). The reader receives validation while the goods are under the custody and control of the reader operator. (Col. 13, lines 60-62).

Thus, in Moore, a postal clerk scans a mail piece, using a hand held reader device. Information from the mail piece is transmitted to a computer, where the information is validated. A message, including the information from the mail piece, is then returned to the reader device to display to the postal clerk. If the indicia is counterfeit, an invalid signal is displayed. Therefore, as noted by the Office Action, Moore discloses scanning mail throughout the mail processing system to detect counterfeit indicia (mail fraud). The system in Moore, however, discloses no more than that as described with respect to conventional verification systems on page 3 of the present Specification. Note that in Moore, the mail piece must be removed from the mail piece processing path by a postal clerk, scanned by the postal clerk using the hand held reader, and then remain with the postal clerk after it has been scanned while the data is transmitted to the control computer and host computer, the data is validated by the control computer and host computer, and a message from each computer is returned to the reader held by the postal clerk. The amount of time required to perform this operation would make it impossible to verify any more than a minimal amount of mail pieces currently processed by the postal service.

The present invention, in contrast, comprises an incoming mail processing center, which may employ one or more mail processing machines, and an outgoing mail processing center, which may employ one or more of the same mail processing machines, that is located downstream in the path of travel from the incoming mail processing center. The incoming mail processing center obtains the mail piece data and uploads the mail piece data to the data

center. The data center performs a verification check on the mail piece data and downloads instructions, based upon the verification check, to the outgoing mail processing center. The outgoing mail processing center uses the instructions received from the data center to control operation of at least one of the mail processing machines to process the mail piece. There is no disclosure, teaching or suggestion in Moore of an incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces and an outgoing mail processing center that includes a plurality of mail processing machines that perform automated processing of mail pieces, where the incoming mail processing center obtains the mail piece data and uploads the mail piece data to the data center, the data center performs a verification check on the mail piece data and downloads instructions, based upon the verification check, to the outgoing mail processing center, and the outgoing mail processing center uses the instructions received from the data center to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece.

Even if, for arguments sake, the hand held field reader of Moore was deemed to be analogous with an incoming mail processing center (which it clearly is not) to obtain the mail piece data, there is still no disclosure, teaching or suggestion in Moore of a data center that downloads instructions based on the verification check to an outgoing mail processing center, that then uses the instructions to control operation of a mail processing machine that performs automated processing of mail pieces to process the mail piece.

The references to Racanelli and Liechti et al. do not cure the above deficiencies. Racanelli is directed to a postal metering machine that includes a readout station. Each department of a business is assigned an account number that is printed on the mailing envelopes or applied with a label. As the item being mailed is fed past the readout station, the department is identified and the postage is automatically charged to that department. (Col. 1, lines 47-60).

There is no disclosure, teaching or suggestion anywhere in Racanelli of a mail piece verification system for processing mail piece that comprises "an incoming mail processing center for receiving the mail piece and obtaining the mail piece data, the incoming mail

processing center including a plurality of mail processing machines that perform automated processing of mail pieces; an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center” wherein “the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece” as is recited in claim 1.

Liechti et al. is directed to a communication system that includes a data center that communicates with a plurality of postage meters via telephone dial-up lines to conduct resetting transactions. The data center is controlled by a postal authority, and can be used for gathering statistical data from each postage meter including the number of mail items in different postal classes processed by the postage meter. The data center can also be utilized to set postage limit amounts, time limits and piece limits on a postage meter. When the imposed limit is reached, the postage meter is programmed to halt operation. (Col. 4, line 43 to Col. 5, line 10). Liechti et al. also describes a conventional technique to reset a postage meter with additional postage by telephone, thereby obviating the need to physically carry the postage meter to the postal authority for resetting. Specifically, the postage meter calls a computerized central facility (data center) for additional available postage. The central facility verifies the meter’s identity and ascertains the availability of funds in the user’s account. After the information is validated, the central facility debits the user’s account and supplies a combination code to the meter or to the user for the user to introduce into the meter. The meter then independently generates another combination code and compares it with the received code. If their relationship is correct, the meter is reset with the additional postage requested. (Col. 1, lines 12-31).

There is no disclosure, teaching or suggestion anywhere in Liechti et al. of a mail piece verification system for processing mail piece that comprises “an incoming mail

processing center for receiving the mail piece and obtaining the mail piece data, the incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center” wherein “the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece” as is recited in claim 1.

There is no disclosure, teaching or suggestion anywhere in Moore, Racanelli, or Liechti et al., either alone or in any combination, of a mail piece verification system for processing mail piece that comprises ““an incoming mail processing center for receiving the mail piece and obtaining the mail piece data, the incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center” wherein “the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece” as is recited in claim 1.

For at least the above reasons, Applicants respectfully submit that claim 1 is allowable over the prior art of record. Claims 2-14, dependent upon claim 1, are allowable along with claim 1 and on their own merits.

Claim 27 includes limitations substantially similar to those of claim 1. For the same reasons claim 1 is allowable over the prior art of record, Applicants respectfully submit that claim 27 is allowable over the prior art of record. Claims 28-31, dependent upon claim 27, are allowable along with claim 27 and on their own merits.

Although the Office Action did not provide the status of claims 15-26, claim 15 includes limitations substantially similar to those of claim 1. For the same reasons claim 1 is allowable over the prior art of record, Applicants respectfully submit that claim 15 is allowable over the prior art of record. Claims 16-26, dependent upon claim 15, are allowable along with claim 15 and on their own merits.

In view of the foregoing remarks, it is respectfully submitted that the claims of this case are in a condition for allowance and favorable action thereon is requested.

Respectfully submitted,



Brian A. Lemm  
Reg. No. 43,748  
Attorney for Applicants  
Telephone (203) 924-3836

PITNEY BOWES INC.  
Intellectual Property and  
Technology Law Department  
35 Waterview Drive  
P.O. Box 3000  
Shelton, CT 06484-8000